

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

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CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE

DONALD A. HARANTS

(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. _____

SHELBY COUNTY

BOARD OF EDUCATION

AND SHELBY COUNTY SCHOOL

(Name of defendant or defendants)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by

42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).
AND VIOLATION OF AGE DISCRIMINATION OF 1967

2. Plaintiff, DONALD A. HARANTS

(name of plaintiff)

is a citizen of the United States and resides at 585 SANDRIDGE ST.
(street address)

MEMPHIS

(city)

U.S.

(country)

TN.

(state)

38122

(zip code)

901-246-3771

(telephone number)

3741

3. Defendant S SHELBY COUNTY BOARD OF EDUCATION
 (defendant's name) SHELBY COUNTY SCHOOLS
 lives at, or its business is located at 160 SOUTH HOLLYWOOD
 (street address)
MEMPHIS TN. 38112

4. Plaintiff sought employment from the defendant or was employed by the defendant at
ELMORE PARK, M.S. 6330 ALTHORNE RD.
 (street address)
BARTLETT U.S. TN. 38134
 (city) (country) (state) (zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of
 this complaint on or about 15 MAY 2010
 (day) (month) (year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment
 Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this
 complaint on or about MIA
 (day) (month) (year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity
 Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this
 complaint on or about 30 SEPTEMBER 2010 AND AMENDED
 (day) (month) (year) CHARGE ON MAY 27, 2011

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue,
 which was received by plaintiff on 29 JULY 2011. (Attach a copy of the notice to
 (day) (month) (year)
 this complaint.)

9. Because of plaintiff's (1) X race, (2) ___ color, (3) X sex, (4) ___ religion, X AGE
 (5) ___ national origin, defendant

(a) ___ failed to employ plaintiff.

(b) ___ terminated plaintiff's employment.

(c) X failed to promote plaintiff.

(d) BY FAILING AND/OR REFUSING TO TRANSFER
ME TO NUTRITION MANAGER, I WAS DEPOTED TO
A PARA PROFESSION (TEACHER AID) POSITION
CAUSING ME TO LOSE HOURS AND PAY.

10. The circumstances under which defendants discriminated against plaintiff were as follows: I WAS EMPLOYED AT ELMORE PARK M.S. AS A NUTRITION MANAGER FROM AUG. 2008 TO MAY 2010. MS. LOVE, PRINCIPAL REQUESTED H.R. TO TRANSFER ME TO ANOTHER SCHOOL. THERE WERE 4 OPENINGS FOR MY POSITION IN 4 ELEMENTARY SCHOOLS. ALL 4 PRINCIPALS ARE FEMALES AND ALL 4 REJECTED ME FOR THE JOB. FOUR FEMALES WERE SELECTED FOR THE POSITION. MS. LANDSTREET, DIRECTOR OF NUTRITION, TRANSFERRED TWO FEMALES MANAGER TO OTHER SCHOOL WHEN THEY REQUESTED IT. MS. LANDSTREET DID NOT FOLLOW SCS POLICIES. H.R. FAILED TO NOTIFY ME THAT I WAS NO LONGER ASSIGNED TO ELMORE PARK IN WRITING AND THAT I WAS REJECTED FOR A TRANSFER. THIS ACTION BY L. WILLIAMS, H.R. DIRECTOR, IS A CLEAR VIOLATION OF SCS POLICIES. SEE EXHIBIT III

11. The acts set forth in paragraph 9 ^{AND 10} of this complaint

CONTINUING OF COMPLAINT (10)

- (a) X are still being committed by defendant.
- (b) _____ are no longer being committed by defendant.
- (c) _____ may still be being committed by defendant.

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) _____ Defendant be directed to employ plaintiff, or
- (b) _____ Defendant be directed to re-employ plaintiff, or
- (c) X Defendant be directed to promote plaintiff, or;
- (d) X Defendant be directed to PLACE ME IN A POSITION OF EQUAL PAY AND HR. WHICH WERE TAKEN AWAY FROM ME.

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes X No ()

Donald A. Harand
SIGNATURE OF PLAINTIFF